

# RELIEF FROM COVID-19 IMPACTS DUE TO LOSS OF OPERATIONS FOR VA GRANTEES PROVIDING HOMELESS SERVICES

APRIL 03, 2020

VA Grant and Per Diem (GPD) implementation of [OMB memorandum M-20-17](#), entitled, *Administrative Relief for Recipients and Applicants of Federal Financial Assistance Directly Impacted by the Novel Coronavirus (COVID-19) due to Loss of Operations* dated March 19, 2020.

As we face challenges in confronting the COVID-19 epidemic, GPD prioritizes the health and safety of the Veteran, grantee, and VA communities. GPD understands the effects this challenge has on GPD-funded grants. We are committed to providing the greatest flexibilities to support your health and safety as well as your work. GPD continually updates our online resources to keep you informed. The latest information is available on our provider website at:

[https://www.va.gov/HOMELESS/GPD\\_ProviderWebsite.asp](https://www.va.gov/HOMELESS/GPD_ProviderWebsite.asp).

The purpose of this guidance is to implement flexibilities authorized by the Office of Management and Budget (OMB) Memorandum M-20-17 from specific administrative, financial management and audit requirements contained in 2 CFR Part 200, Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards, without compromising accountability requirements. GPD grantees are reminded of the requirement to maintain appropriate records and documentation necessary to support charges to GPD awards.

Please note that, pursuant to OMB guidance, these administrative relief flexibilities are intended to be time limited. OMB plans to reassess their applicability within 90 days and GPD will update our guidance, as needed, at that time. Except where noted below, the following flexibilities are applicable to GPD grantees affected by the loss of operational capacity and increased costs due to the COVID-19 emergency.

**1. Flexibility with SAM registration.** (2 CFR § 200.205)

GPD is providing this flexibility to all applicants for the currently open Transition In Place (TIP) notice of funding availability (NOFA). GPD will not consider the System for Award Management (SAM) registration status at the time of application receipt. Instead, GPD will evaluate the SAM status prior to awarding successful applications.

Current registrants in SAM with active registrations expiring before May 16, 2020, automatically will be afforded a one-time extension of 60 days. Grantees do not have to take any action to receive this automatic flexibility provided by OMB.

**2. Flexibility with application deadlines.** (2 CFR § 200.202)

GPD is providing this flexibility to the currently open TIP NOFA. The application deadline for the TIP NOFA is **04/22/2020 at 4:00pm eastern**. This deadline remains unchanged. However, because of the challenges faced by the community due to the COVID-19 emergency, GPD is extending the time available for submitting letters of coordination from the VA Medical Centers for the application package. The extended deadline for submitting letters of coordination from a VA Medical Center is

**05/13/2020 at 4:00pm eastern.** Letters of coordination from a VA Medical Center that are submitted after 04/22/2020 4:00pm eastern but before 05/13/2020 at 4:00pm eastern must be submitted by email to [GPDgrants@va.gov](mailto:GPDgrants@va.gov) with the subject heading TIP LETTER OF COORDINATION.

NOTE: The application deadline for the TIP NOFA remains 04/22/2020 at 4:00pm eastern. All applications are due by the date and time via the [online application portal](#).

NOTE: Letters of coordination from organizations such as the continuum of care (CoC), the Housing Authority, and any other collaborators (i.e. any letters *not* from the VA Medical Center) are due as part of the complete application package submitted via the online application portal by 04/22/2020 at 4:00pm eastern.

3. **Waiver for Notice of Funding Opportunities (NOFOs) Publication.** (2 CFR § 200.203)  
This flexibility is not applicable to GPD. GPD does not have a need to publish an additional NOFA at this time.
4. **No-cost extensions on expiring awards.** (2 CFR § 200.308)  
This flexibility is not applicable to GPD at this time. GPD will consider providing this flexibility at a later time, if needed.
5. **Abbreviated non-competitive continuation requests.** (2 CFR § 200.308)  
This flexibility will not be used by GPD at this time. If any non-competitive continuation awards are expected during the period of these COVID-19-related flexibilities, GPD will provide this flexibility by accepting a brief statement from recipients to verify that they are in a position to: 1) resume or restore their project activities; and 2) accept a planned continuation award. As needed, GPD will post specific instructions on our [website](#). GPD will examine the need to extend this approach on subsequent continuation award start dates as recipients have an opportunity to assess the situation.
6. **Allowability of salaries and other project activities.** (2 CFR § 200.403, 2 CFR § 200.404, 2 CFR § 200.405)  
This flexibility will not be used by GPD at this time. The per diem rate is set by law. GPD continues to remind grantees that they may request rate adjustments up to the maximum allowed rate as needed. This flexibility will be reconsidered as needed.
7. **Allowability of Costs not Normally Chargeable to Awards.** (2 CFR § 200.403, 2 CFR § 200.404, 2 CFR § 200.405)  
This flexibility will not be used by GPD at this time. See previous item #6. GPD's activities and per diem payments do not lend themselves to needing this sort of flexibility at this time. This flexibility will be reconsidered as needed.
8. **Prior approval requirement waivers.** (2 CFR § 200.407)  
GPD is waiving the requirement that grantees request prior approval to flex bed numbers (i.e. change of scope per [2 CFR 200.308](#)). Also, GPD is waiving the requirement that grantees request prior approval for new personnel or for a reduction in personnel effort (personnel changes per [2 CFR 200.308](#)). No cost implications for GPD are expected from using this flexibility. Grantees must maintain appropriate records and cost documentation.

**9. Exemption of certain procurement requirements.** (2 CPR§ 200.319(b), 2 CPR§ 200.321)

This flexibility is not needed by GPD at this time.

**10. Extension of financial, performance, and other reporting.** (2 CPR§ 200.327, 2 CPR§ 200.328)

GPD is providing this flexibility. The quarterly review for case management grantees is delayed for 90 days and will resume for the 3<sup>rd</sup> quarter on July 1, 2020. Also, the nutrition inspections for per diem only grantees are delayed for 90 days and will resume for the 3<sup>rd</sup> quarter on July 1, 2020.

**11. Extension of currently approved indirect cost rates.** (2 CPR§ 200.414 (c))

GPD is providing this flexibility to all grantees.

Grantees may continue to use the currently approved indirect cost rates (i.e., predetermined, fixed, or provisional rates) to recover their indirect costs on Federal awards. Grantees may request an extension on the use of the current rates for one additional year without submission of an indirect cost proposal. Grantees also may submit a request to its cognizant agency for an extension of the indirect cost rate proposal submission to finalize the current rates and establish future rates.

**12. Extension of closeout.** (2 CPR§ 200.343)

This flexibility is not needed. All GPD grants start the closeout process after the OMB flexibilities are set to expire (i.e. after mid-June 2020, specifically on 10/1/2020).

**13. Extension of Single Audit submission.** (2 CFR § 200.512)

GPD is providing this flexibility to all grantees. No action is needed by grantees. This extension is automatic for all grantees who have not yet filed.

Recipients and subrecipients that have not yet filed their single audits with the Federal Audit Clearinghouse as of the date of the issuance of the OMB Memorandum that have fiscal year-ends through June 30, 2020, are authorized to delay the completion and submission of the Single Audit reporting package, as required under Subpart F of 2 CFR § 200.501 – Audit Requirements, to six (6) months beyond the normal due date. No formal approval for this extension is required; however, recipients and subrecipients must maintain documentation of the reason for the delayed filing. Recipients and subrecipients who currently qualify as a “low-risk auditee” under the criteria of 2 CFR § 200.520(a), and who take advantage of this extension will continue to qualify as a “low-risk auditee,” absent other reasons for a change in qualification.